

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

**MUHAMMAD TANVIR, JAMEEL
ALGIBHAH, and NAVEED SHINWARI,**

Plaintiffs,

v.

Case No. 13-CV-6951 (RA)

FNU TANZIN, et al.,

Defendants.

MOTION TO WITHDRAW AS ATTORNEY FOR PLAINTIFFS

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 1.4, Ramzi Kassem respectfully moves to withdraw as counsel in the above-captioned case. I am on leave from the CLEAR Project of Main Street Legal Services, Inc. at CUNY School of Law in order to assume duties for a period of U.S. government service. Co-counsel at CLEAR as well as at the Center for Constitutional Rights and at Debevoise & Plimpton LLP shall remain counsel of record for Plaintiffs in this action. In support of this Motion, I submit the annexed Declaration of Ramzi Kassem. Pursuant to Local Civil Rule 1.4, a copy of this Motion has been served on all parties via ECF.

Dated: June 26, 2022
New York, NY

Respectfully submitted,

/s/_____

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Defendants.

DECLARATION OF RAMZI KASSEM

Pursuant to 28 U.S.C. § 1746, I certify that the following is true and correct to the best of my knowledge:

1. My name is Ramzi Kassem. I am a Professor of Law at the City University of New York (CUNY) School of Law, where I am the founding director of the Creating Law Enforcement Accountability & Responsibility or CLEAR Project. I am an attorney admitted to practice law in the State of New York and I serve as pro bono counsel for Plaintiffs in the above-captioned matter.
2. The procedural posture of this case is as follows: on remand from the U.S. Supreme Court, Defendants' renewed Motion to Dismiss is presently before the Court.
3. I move to withdraw as counsel for Plaintiffs in this case because I am on leave from the CLEAR Project of Main Street Legal Services, Inc. at CUNY School of Law in order to assume duties for a period of U.S. government service.
4. My leave from the CLEAR Project constitutes good cause for my withdrawal as an attorney in this case.
5. I have conferred with Plaintiffs about my withdrawal from the case.
6. Attorneys with the CLEAR Project will continue to represent Plaintiffs in this matter, along with co-counsel at the Center for Constitutional Rights and at Debevoise & Plimpton LLP.
7. There is no retaining or charging lien involved in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York City on this 26th day of June, 2022.

/s/_____

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